



February 6, 2020

Chris Nagel
Director, Solid Waste Management Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Re: Notification of Closure by Removal - City of Columbia Water & Light Department
Inactive CCR Surface Impoundment (More's Lake)

Dear Mr. Nagel:

This letter report, prepared by Burns & McDonnell on behalf of the City of Columbia (City), provides notification of closure by removal of CCR material, a summary documentation of the CCR removal activities, and groundwater monitoring data.

Introduction & Site Background

The final rule for the regulation and management of Coal Combustion Residuals (CCR) was published by the United States Environmental Protection Agency (USEPA) in 40 CFR §257 and §261 (herein referred to as the Final Rule). The Final Rule applies to the inactive CCR surface impoundment known as More's Lake at the City's Columbia Municipal Power Plant (CMPP).

The following sections describe the activities relevant to closure by removal per 40 CFR §257.102(c), which states:

(c) *Closure by removal of CCR. An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in appendix IV to this part.*

CCR Material Removal

The City began CCR material removal in the summer of 2017, hauling the CCR material to the Columbia, MO Landfill for final disposal. The CCR material was substantially removed from the impoundment in late summer of 2018 with the exception of small isolated areas, staged piles, and a submerged area in the pond sump. The City continued to remove residual CCR and underlying soil after initial, informal inspections by Burns & McDonnell during this period.

Burns & McDonnell developed a Closure by Removal Verification Plan (Plan) for submittal to the Missouri Department of Natural Resources (MDNR) Solid Waste Management Program



February 6, 2020
Mr. Chris Nagel
Page 2

(SWMP) in August 2018. The SWMP approved the Plan with conditions in September 2018. Removal verification inspections began on September 19, 2018. As provided in the Plan, visual inspections were completed using a 50'x50' grid developed to promote adequate visual coverage of the impoundment surface. The grids lines were overlaid onto a site map and loaded into a GPS unit, which allowed personnel to monitor their location on the site and systematically walk through the center of each grid. If personnel identified any area where visual CCR remained, the Engineer directed the City to perform additional removal at those locations. The City marked the locations with flags in the field and Burns & McDonnell logged the location on the grid. A follow-up inspection was conducted on October 5, 2018, but several areas with residual CCR still remained. Following this inspection, inclement weather postponed completion of the residual CCR removal and delayed the removal verification process.

In the winter and spring of 2019, the City continued removal of residual CCR in the identified locations as well as in other areas previously stockpiled or submerged under water in the ponded sump area. In May of 2019, the City contacted Burns & McDonnell to resume the CCR removal verification inspections. Due to the extended time and work completed since the previous inspections, Burns & McDonnell approached the 2019 inspections assuming no grids had been previously cleared. The first inspection of 2019 took place on May 14, 2019. The same procedure was performed as described above with visually identified CCR flagged in the field and logged on the grid map. Nine relatively small, isolated locations were flagged during this inspection and several grids were submerged under the ponded water surface. Following this inspection, an updated map figure was provided to the City, showing the isolated locations where visual CCR remained and the submerged grids that were not inspected. This figure is provided in Attachment 1 (Figure 1). The next inspection took place on May 30, 2019, during which final CCR residual material locations were flagged in the field for removal. The City completed the removal of the CCR material at the identified areas over the next day. On May 31st the final inspection was made to verify all CCR material flagged the previous day had been visually removed. Figure 2 in Attachment 1 reflects the final inspection completed on May 31, 2019 with all grids cleared.

A photo log documenting the removal activities as described above has been included as Attachment 2. A topographic survey of More's Lake dated January 2, 2020 has been included as Attachment 3.

Groundwater Monitoring

Burns & McDonnell performed groundwater monitoring activities on behalf of the City in accordance with the Final Rule beginning in December 2017. Following analysis of the eight initial monitoring events to determine background levels of groundwater constituents (the last of which was performed in March 2019) it was determined that there were statistically significant increases over background levels for certain Appendix III constituents. In July 2019, an



February 6, 2020
Mr. Chris Nagel
Page 3

assessment groundwater monitoring program was established and in August 2019, an initial assessment monitoring event was performed. Groundwater protection standards were established in October 2019 per the Final Rule (40 CFR §257.95(h)) for comparison to the August 2019 monitoring results. No Appendix IV constituents were detected at concentrations above their respective groundwater protection standard in the August 2019 groundwater samples. A subsequent assessment monitoring event was performed in December 2019. Again, the sampling results showed that no Appendix IV constituents were detected at a concentration above the groundwater protection standard. Groundwater monitoring analytical results for the August and December 2019 assessment monitoring events, as well as the established groundwater protection standards are provided in Attachment 4.

Closure by Removal Certification

At this time, having removed the CCR material from the impoundment and showing no Appendix IV constituent concentrations above groundwater protection standards for two consecutive events, it is the desire of the City to certify More's Lake as closed in accordance with 40 CFR §257.102(c). The closure by removal certification required per the Final Rule is provided in Attachment 5.

As the Final Rule requirements for closure by removal have been met and no post closure care requirements apply to the facility per 40 CFR §257.104(a)(2), the City proposes to discontinue groundwater sampling activities at More's Lake effective immediately. A final Annual Groundwater Monitoring Report will be prepared per the Final Rule in August 2020.

If you have questions or comments regarding the information presented herein, please contact Brian Weis at 816-823-7824 or via email at bweis@burnsmcd.com.

Sincerely,

A handwritten signature in blue ink that reads "Brian C. Weis".

Mr. Brian C. Weis, PE
Project Manager

cc: Christian Johanningmeier (City)
Darrell Hartley (MDNR)
Jeremiah Jackson (MDNR)



February 6, 2020
Mr. Chris Nagel
Page 4

Attachment 1 – Visual Inspection Grid (Showing progress after May 14, 2019 inspection)
Visual Inspection Grid (Showing completion on May 19, 2019)

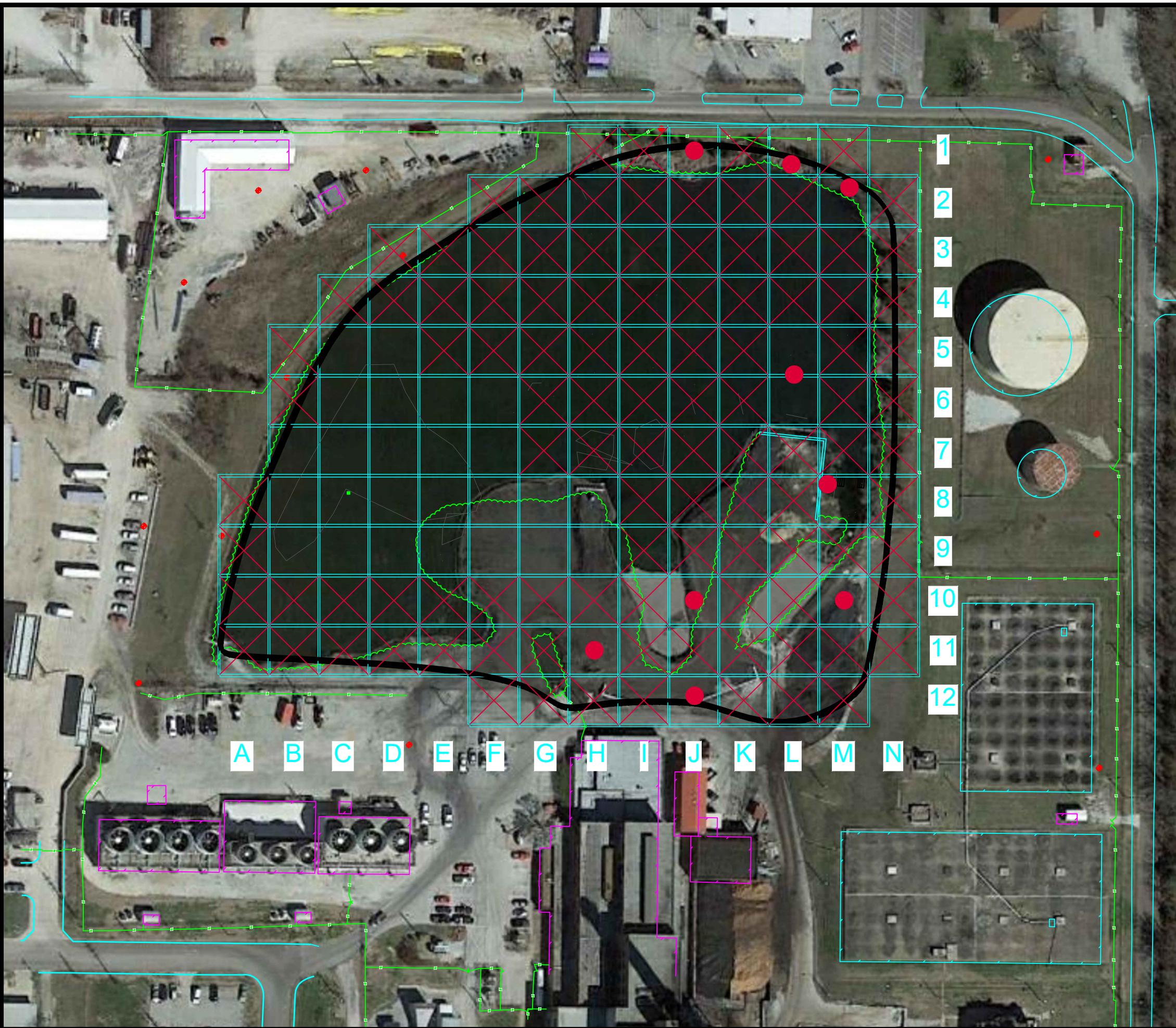
Attachment 2 – Photo Log of Removal Activities

Attachment 3 – Topographic Survey Map

Attachment 4 – Groundwater Monitoring Data

Attachment 5 – Certification of Closure by Removal

ATTACHMENT 1 – VISUAL INSPECTION GRIDS



- LEGEND**
- GRID AREA
 - HISTORICAL SURFACE IMPOUNDMENT BOUNDARY
 - X VISUALLY INSPECTED AND CLEARED FOR MATERIAL REMOVAL
 - INDICATES GRID HAS OBSERVED CCR MATERIAL (LOCATION FLAGGED DURING INSPECTION)
 - INDICATES GRID HAS YET TO BE CLEARED DUE TO RETAINED WATER

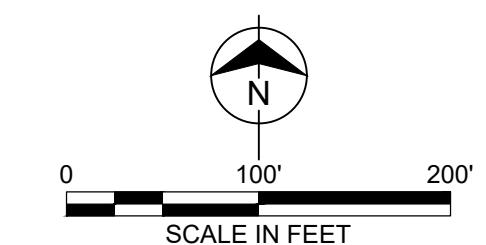
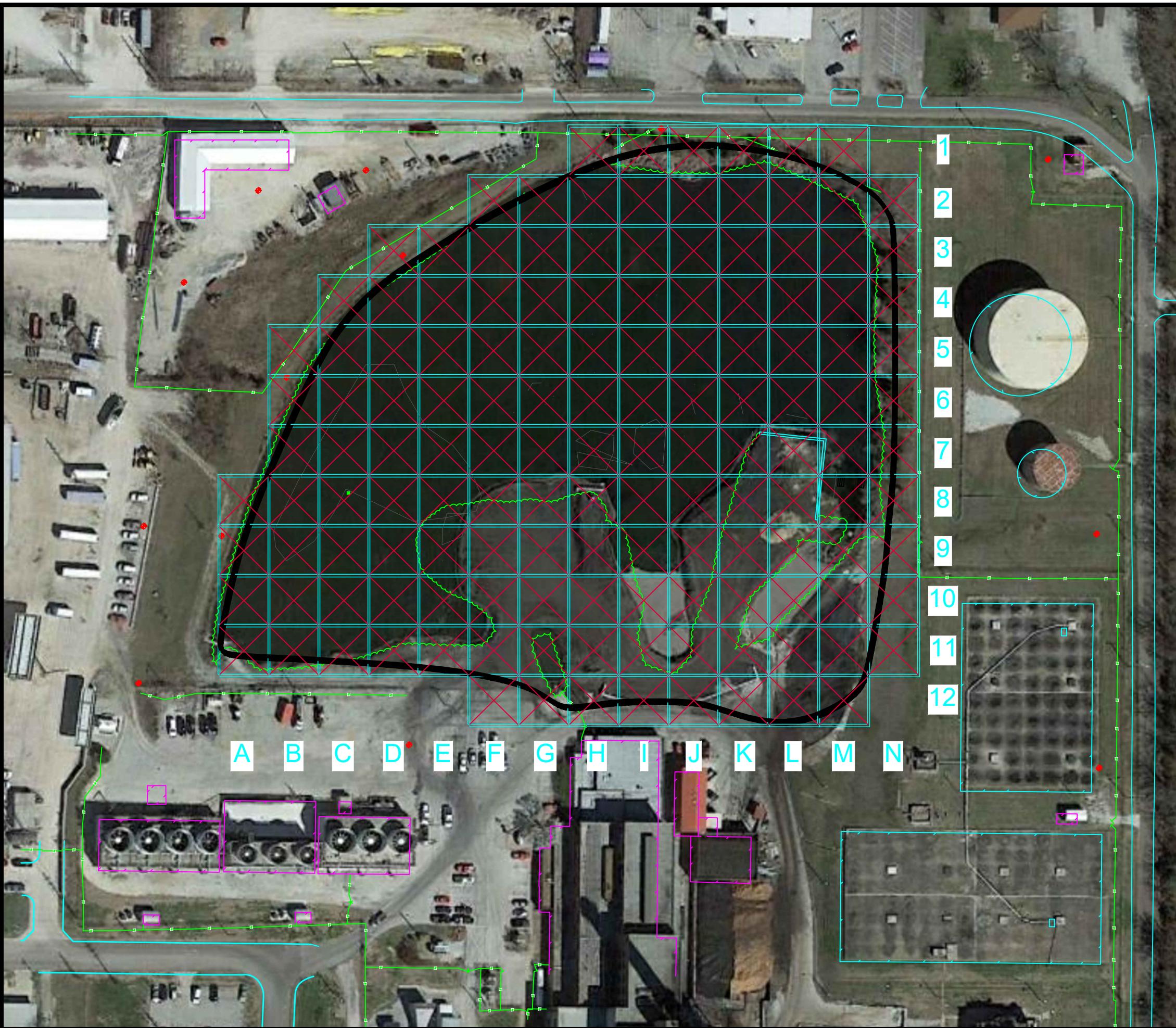


FIGURE 1
MAY 14, 2019
VISUAL INSPECTION GRID
COLUMBIA MUNICIPAL POWER
PLANT
COLUMBIA, MISSOURI

**BURNS
MCDONNELL**



ATTACHMENT 2 – PHOTO LOG OF REMOVAL ACTIVITES

BURNS & MCDONNELL ENGINEERING CO., INC.

PHOTOGRAPH LOG

Client: City of Columbia
Project Location: More's Lake, Columbia, Missouri
Project Number: 93647
Report: CCR Removal

| Photo No. | Date Taken | Description | Status |
|-----------|------------|---|-----------------------------------|
| 1 | 8/2/2016 | SW corner of pond looking E | Prior to Removal Activities |
| 2 | 8/2/2016 | Brush area | Prior to Removal Activities |
| 3 | 8/29/2016 | SW corner of pond looking N | Prior to Removal Activities |
| 4 | 8/29/2016 | W side of pond looking SE | Prior to Removal Activities |
| 5 | 10/18/2016 | W side of pond looking SE | Prior to Removal Activities |
| 6 | 2/3/2017 | S looking N | Cleanup Process |
| 7 | 2/3/2017 | S looking W | Cleanup Process |
| 8 | 2/3/2017 | S looking E | Cleanup Process |
| 9 | 9/19/2018 | Spot outlined to be removed | Initial Visual Inspection/Cleanup |
| 10 | 9/19/2018 | Road area during inspection | Initial Visual Inspection/Cleanup |
| 11 | 9/19/2018 | Brush area | Initial Visual Inspection |
| 12 | 9/19/2018 | Initial Visual Inspection SE looking N | Initial Visual Inspection |
| 13 | 9/19/2018 | Initial Visual Inspection S looking N | Initial Visual Inspection |
| 14 | 11/6/2018 | S looking NW | Follow-up Visual Inspection |
| 15 | 11/6/2018 | S looking NE | Follow-up Visual Inspection |
| 16 | 5/31/2019 | Final Visual Inspection W looking E | Final Visual Inspection |
| 17 | 5/31/2019 | Final Visual Inspection middle looking SE | Final Visual Inspection |
| 18 | 5/31/2019 | Final Visual Inspection W looking E | Final Visual Inspection |

PHOTOS

Photo # 1



Photo # 2



Photo # 3



Photo # 4



Photo # 5



Photo # 6



**BURNS
MCDONNELL**

PHOTOS

Photo # 7



Photo # 8



Photo # 9



Photo # 10



Photo # 11



Photo # 12



PHOTOS

Photo # 13



Photo # 14



Photo # 15



Photo # 16



Photo # 17



Photo # 18



 **BURNS
MCDONNELL**

ATTACHMENT 3 – TOPOGRAPHIC SURVEY MAP

COLUMBIA MUNICIPAL POWER PLANT

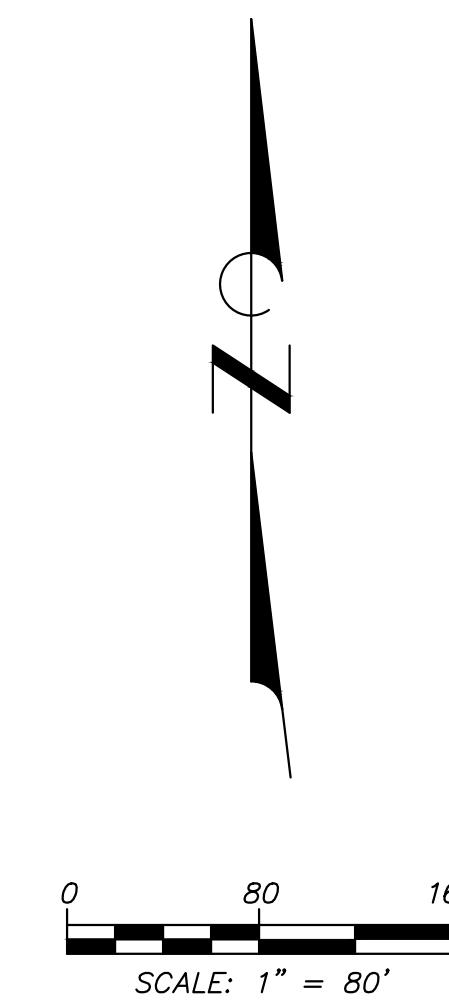
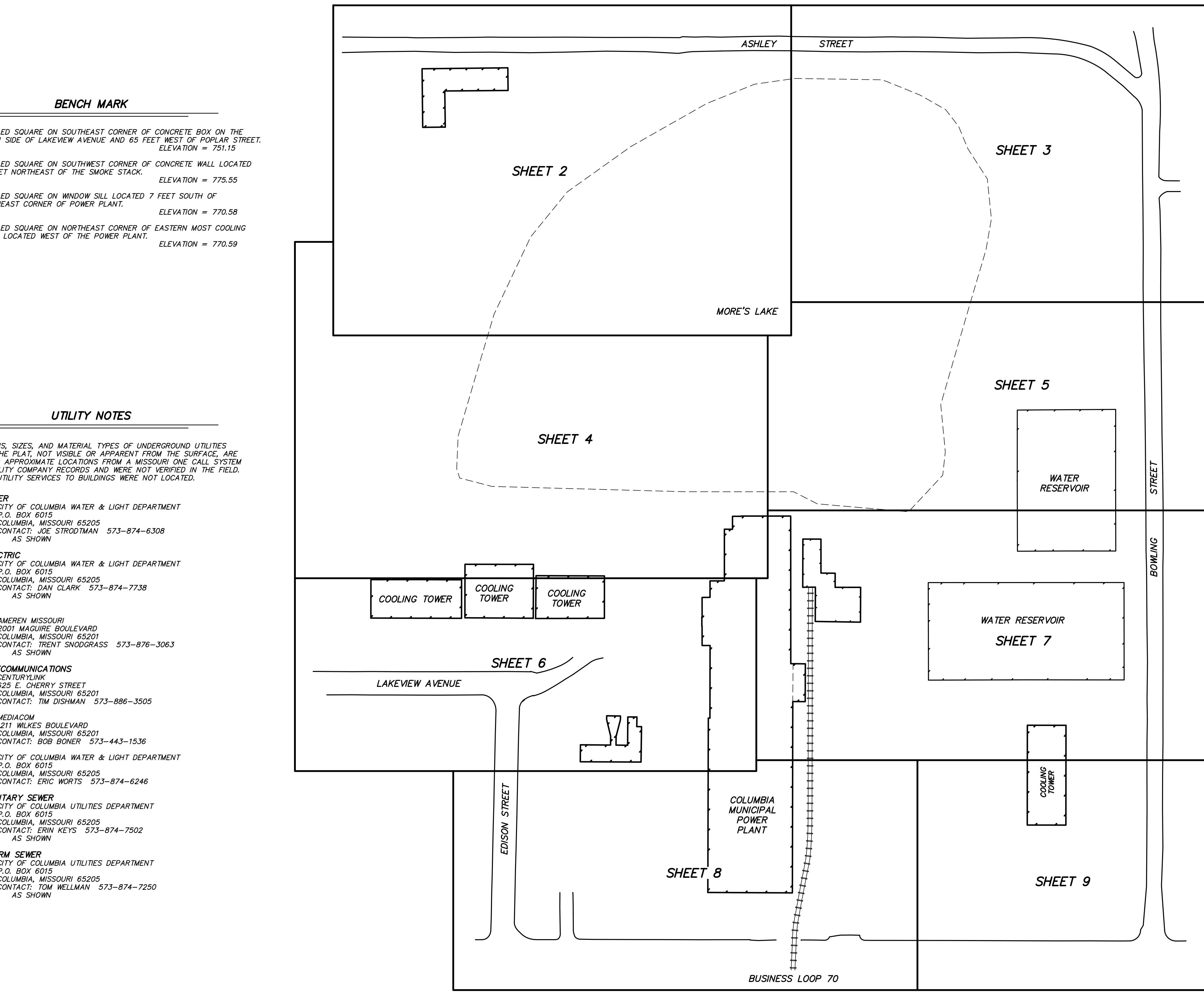
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573-449-2646 | www.esstinc.com
Other Offices:
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Missouri Land Surveying Corporation # 200404672

COLUMBIA MUNICIPAL POWER PLANT

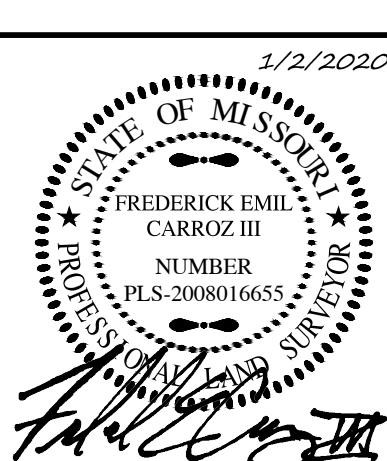
COLUMBIA, BOONE COUNTY, MISSOURI



| LEGEND | |
|--------|-----------------------------|
| E | PROPERTY LINE |
| T | ELECTRIC LINE |
| F | TELEPHONE LINE |
| FO | FOOTPATH |
| UE | FIBER OPTIC LINE |
| UTV | UNDERGROUND ELECTRIC LINE |
| S | UNDERGROUND TELEVISION LINE |
| SS | SANITARY SEWER LINE |
| G | STORM SEWER LINE |
| W | GAS LINE |
| CW | WATER LINE |
| X | CHILLED WATER LINE |
| | FENCE |
| | TREE & BRUSH LINE |
| | DRAINAGE SWALE |
| | EXISTING CONTOUR |
| | ANCHOR |
| | IRON |
| CP | CONTROL POINT |
| CI | CAST IRON PIPE |
| PP | CORRUGATED PLASTIC PIPE |
| OMP | CORRUGATED METAL PIPE |
| CO | CLEANOUT |
| DI | DUCTILE IRON PIPE |
| EM | ELECTRIC METER |
| FES | FLARED END SECTION |
| FH | FIRE HYDRANT |
| FL | FLOW LINE |
| GM | GAS METER |
| GV | GEAR VALVE |
| LS | LIGHT STANDARD |
| PIV | POST INDICATOR VALVE |
| PVC | POLYVINYL CHLORIDE PIPE |
| RCP | REINFORCED CONCRETE PIPE |
| RD | ROOF DRAIN |
| TW | TOP OF WALL |
| UP | UTILITY POLE |
| URD | UNDERGROUND ROOF DRAIN |
| VCP | VITRIFIED CLAY PIPE |
| VM | WATER METER |
| WV | WATER VALVE |

SURVEY CONTROL POINTS

| MODIFIED STATE PLANE COORDINATES NAD 83, MISSOURI CENTRAL ZONE, NAVD 88, U.S. SURVEY FEET | | | |
|--|------------|------------|-----------|
| POINT # | NORTH | EAST | ELEVATION |
| CP1 | 1140314.80 | 1691872.74 | 760.03 |
| CP2 | 1141112.83 | 1692922.84 | 785.32 |
| CP3 | 1139970.52 | 1692897.98 | 766.85 |
| CP4 | 1139949.23 | 1692111.29 | 750.70 |
| CP5 | 1140542.35 | 1692250.61 | 770.91 |
| CP6 | 1140635.93 | 1692895.28 | 786.06 |
| CP7 | 1140284.76 | 1692903.53 | 787.16 |



FREDERICK E. CARROZ III
PROFESSIONAL LAND SURVEYOR
PLS - 200801655

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Date

JANUARY 2, 2020

Revised

MORE'S LAKE VOLUME

| Water Level | Cubic Yards | Gallons | Acre Feet |
|-------------|-------------|------------|-----------|
| 744 | 84 | 17,061 | 0.05 |
| 746 | 651 | 131,416 | 0.40 |
| 748 | 2,069 | 417,834 | 1.28 |
| 750 | 5,025 | 1,014,895 | 3.11 |
| 752 | 9,812 | 1,981,708 | 6.08 |
| 754 | 16,966 | 3,426,768 | 10.52 |
| 756 | 26,978 | 5,448,909 | 16.72 |
| 758 | 39,576 | 7,993,323 | 24.53 |
| 760 | 54,093 | 10,925,406 | 33.53 |
| 762 | 70,166 | 14,171,657 | 43.49 |
| 764 | 87,842 | 17,741,754 | 54.45 |
| 766 | 106,923 | 21,595,605 | 66.27 |
| 768 | 127,190 | 25,689,124 | 78.84 |

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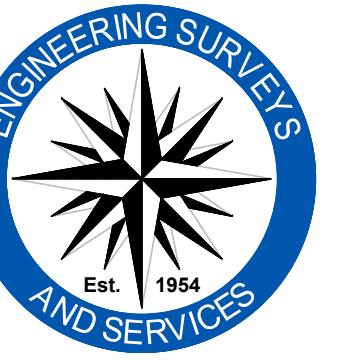
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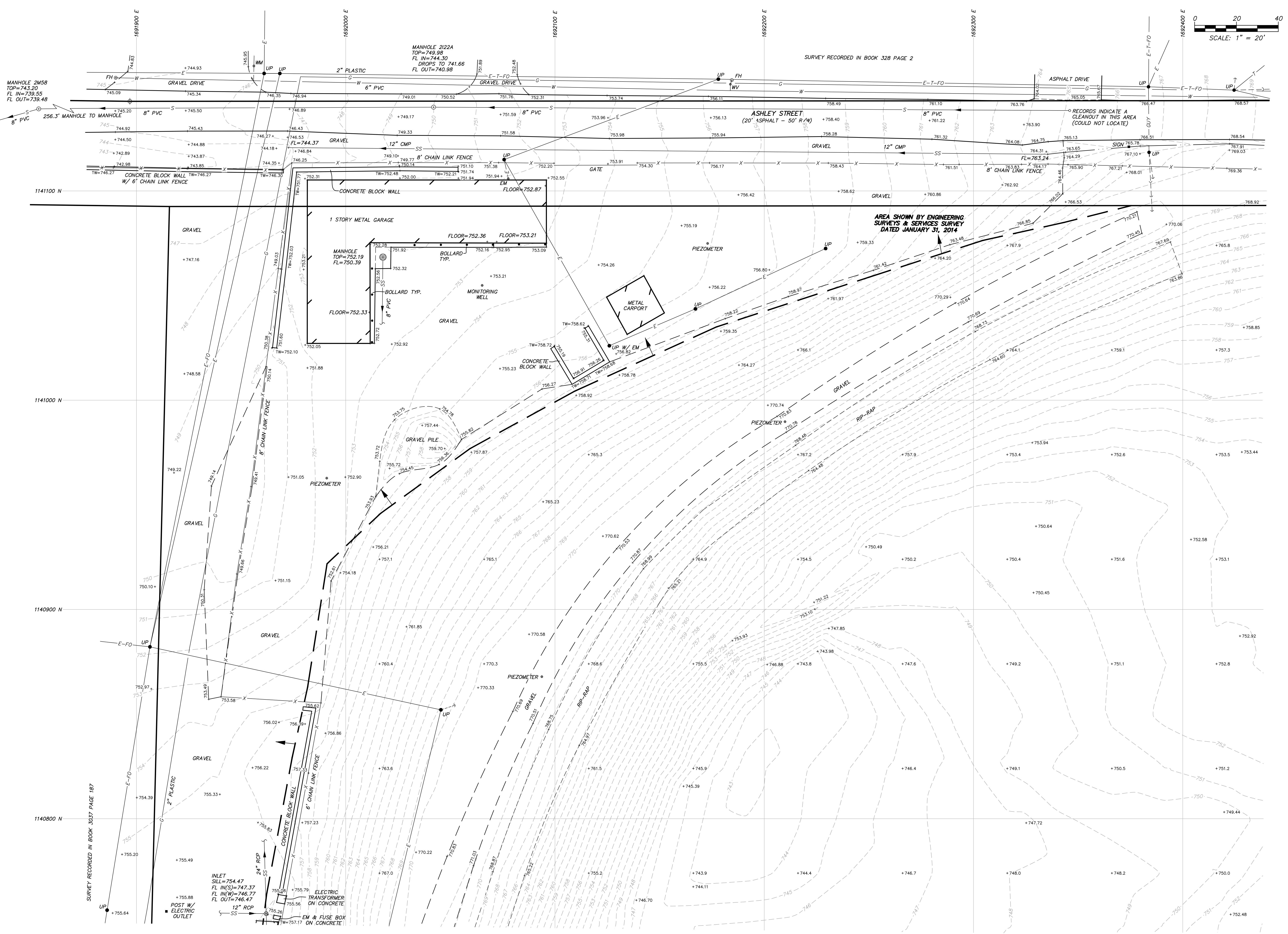


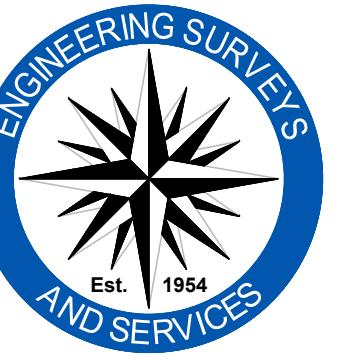
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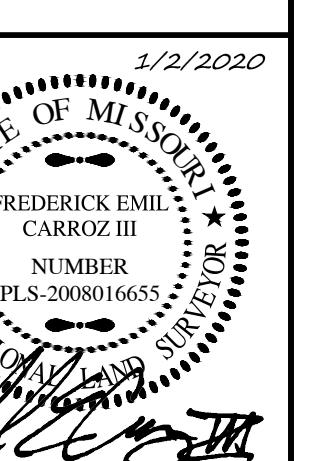
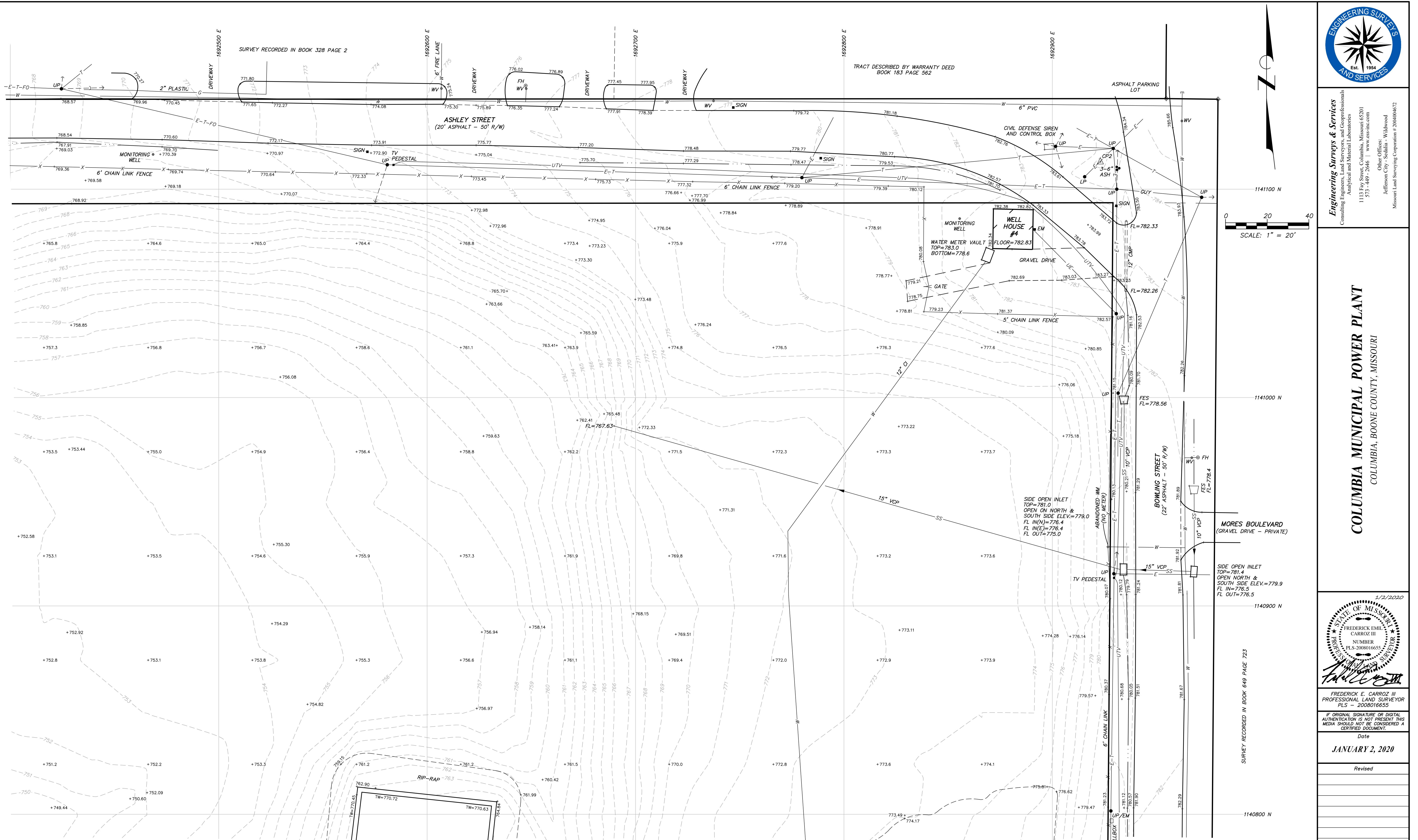
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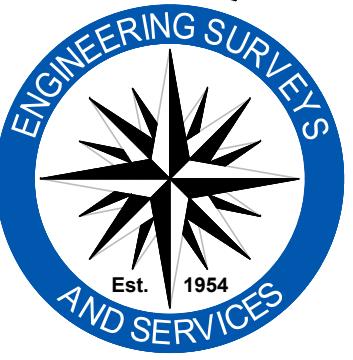
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BIA MUNICIPAL POWER

W

A circular seal for a Missouri land surveyor. The outer ring contains the text "STATE OF MISSOURI" at the top and "LAND SURVEYOR" at the bottom, separated by a vertical line. The inner circle contains "FREDERICK EMIL CARROZ III" at the top, "NUMBER" in the center, and "PLS-2008016655" at the bottom. The word "PROFESSIONAL" is written vertically along the left side of the inner circle. Two five-pointed stars are positioned on the left and right sides of the inner circle.

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ANSWER The answer is **100**.

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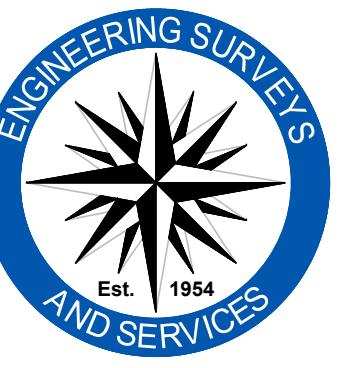
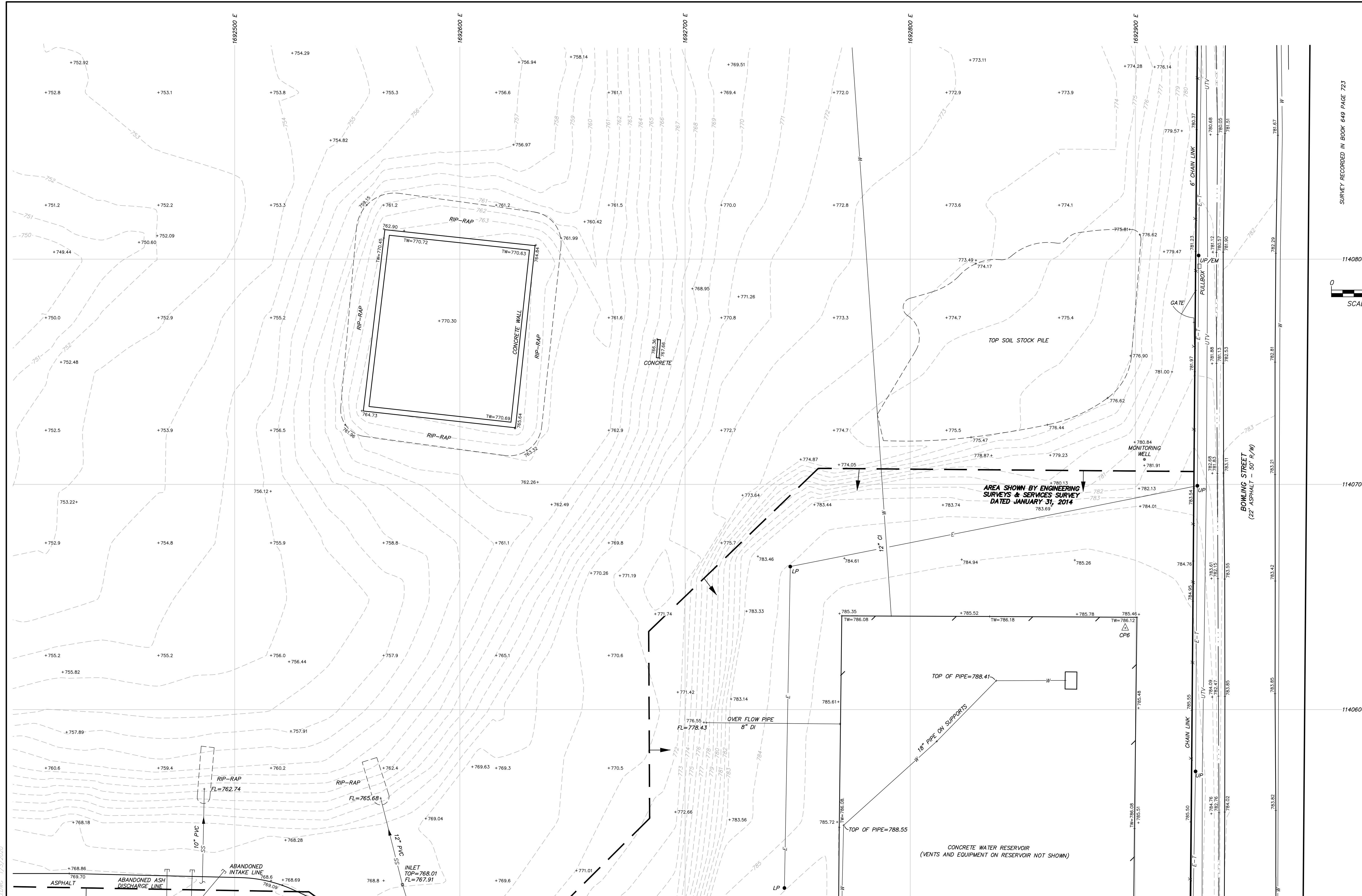
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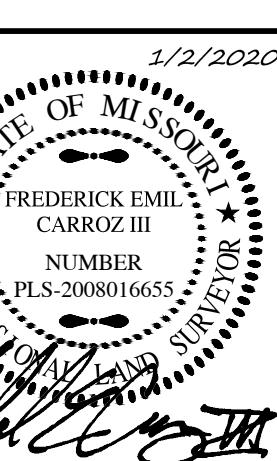
4 of 9



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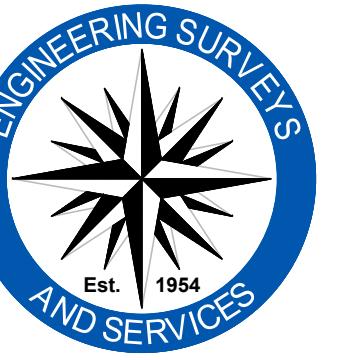
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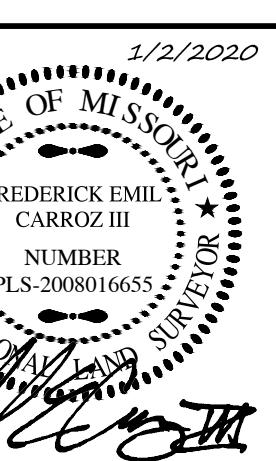
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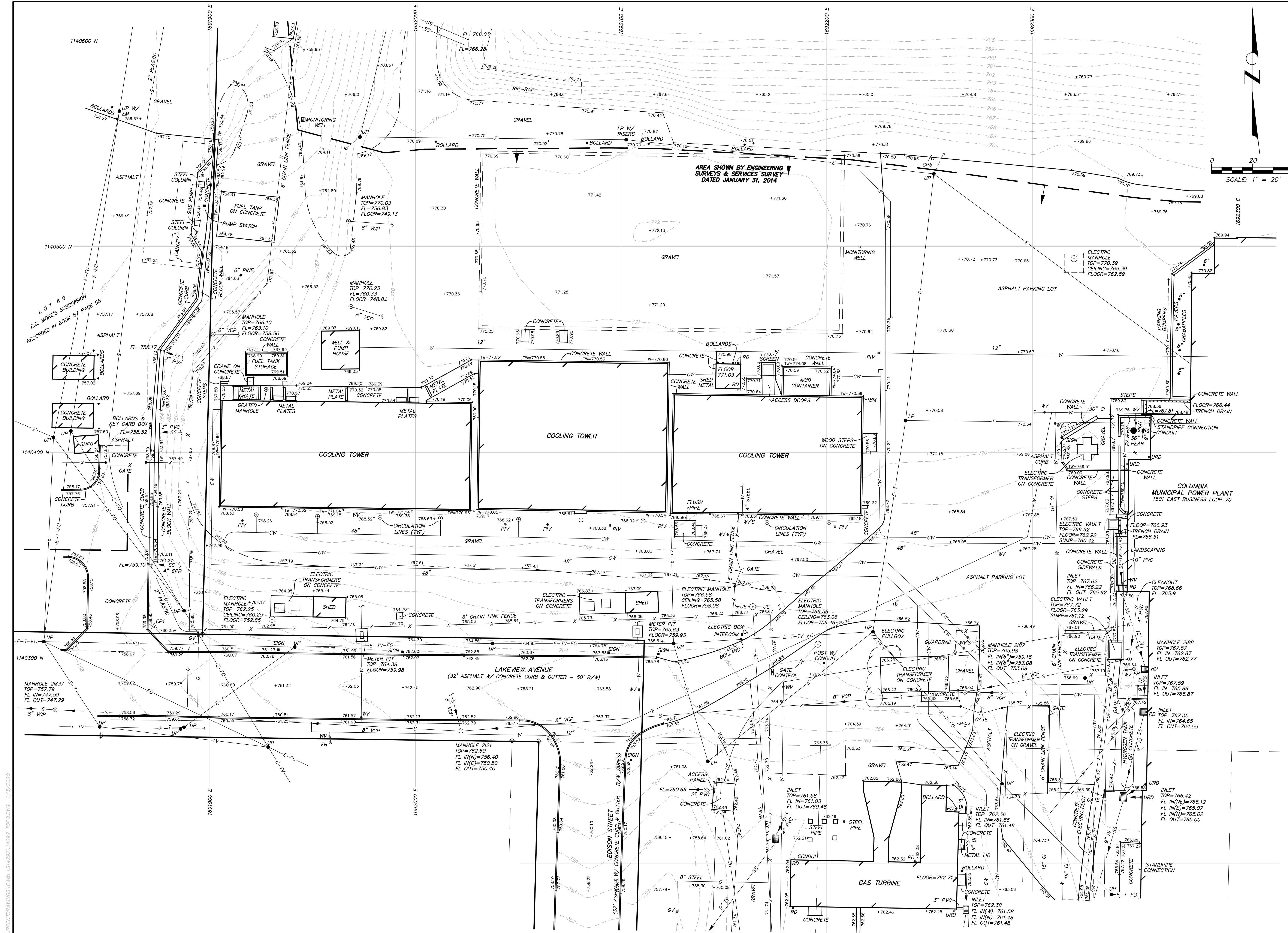
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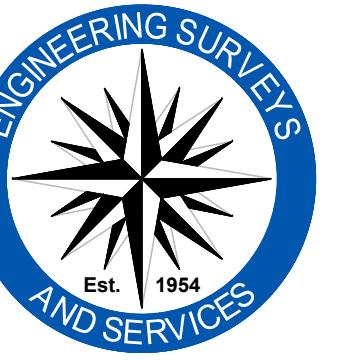
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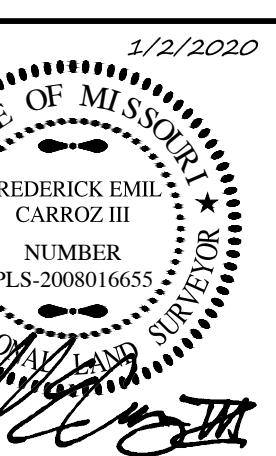
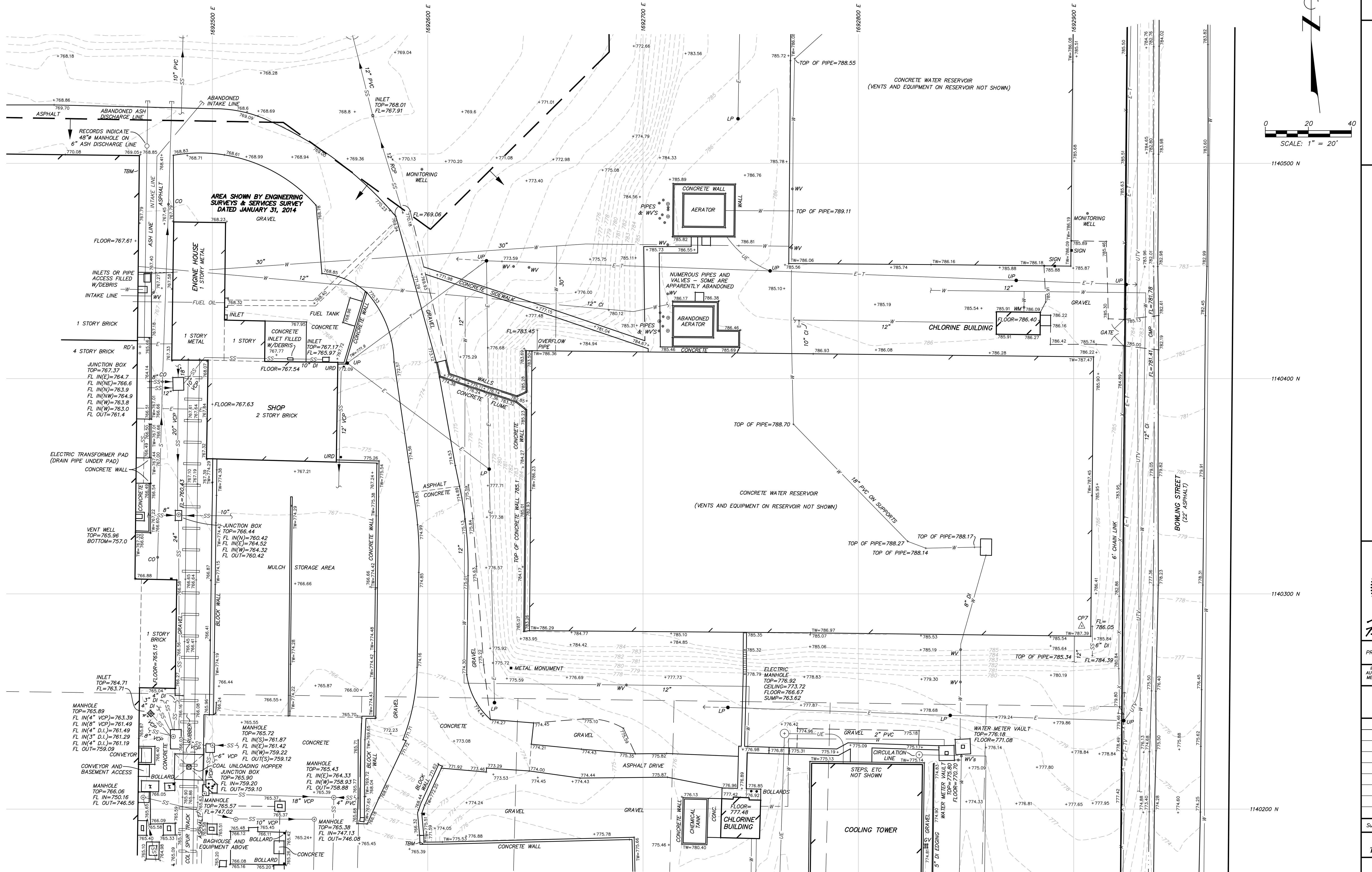


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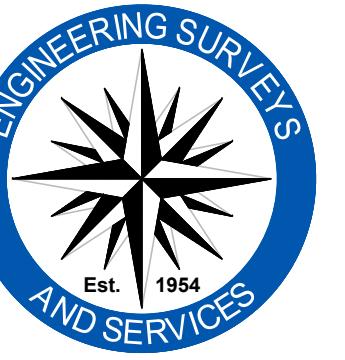
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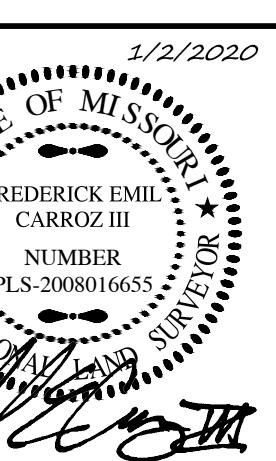
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FEBRUARY 1, 2020

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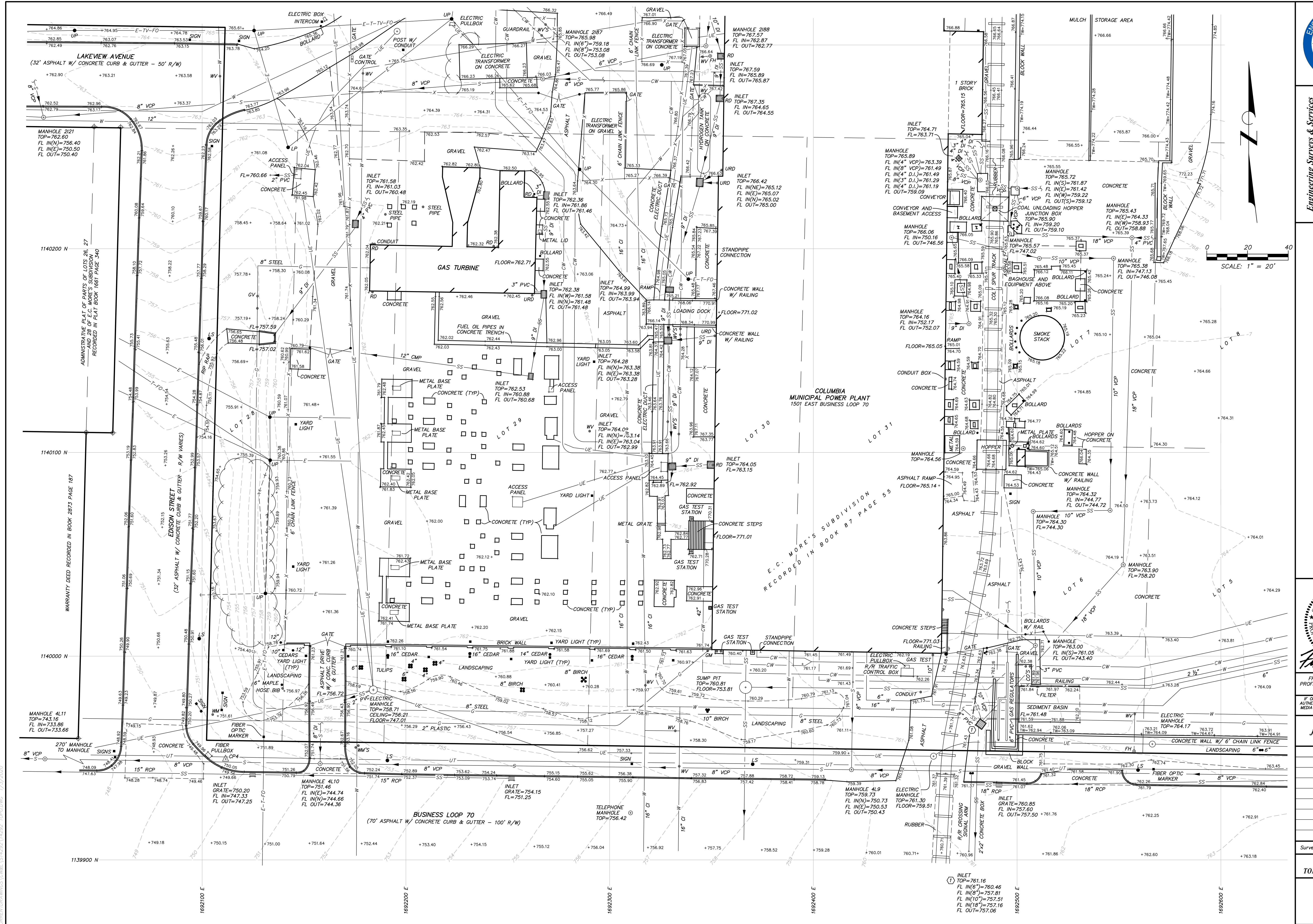
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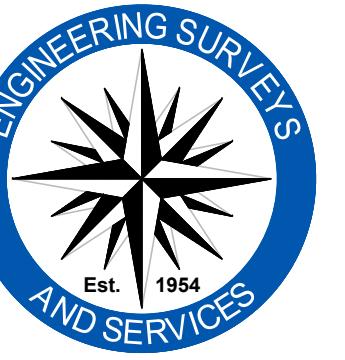
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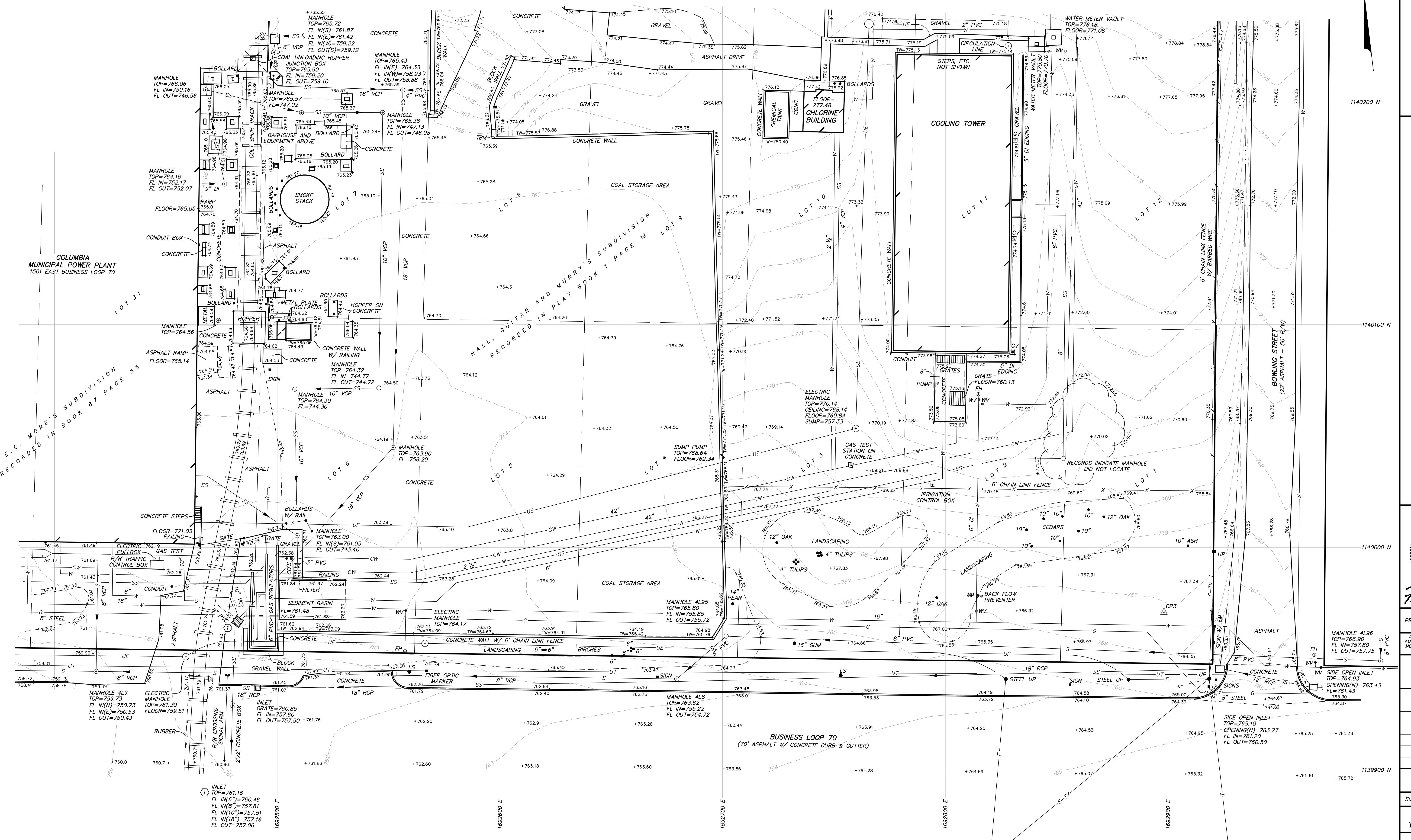
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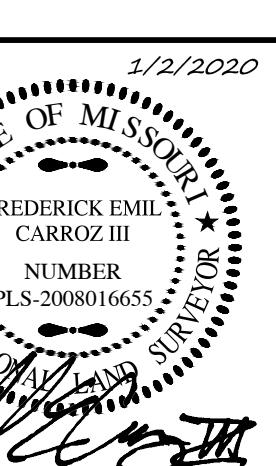
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ATTACHMENT 4 – GROUNDWATER MONITORING DATA

Attachment 4
Summary Groundwater Analytical Results: August 2019 and December 2019
Inactive Ash Pond (More's Lake)
Columbia Municipal Power Plant - Columbia, MO

| | | GWPS | Sample Location Sample Date Lab ID | MW-1 8/26/2019 60313018002 | MW-1 12/03/2019 60322982002 | MW-2 8/26/2019 60313018003 | DUP-1 8/26/2019 60313018004 | MW-2 12/03/2019 60322982003 | DUP-1 12/03/2019 60322982004 | MW-3 8/27/2019 60313169003 | MW-3 12/04/2019 60323115002 | MW-4 8/27/2019 60313169002 | MW-4 12/04/2019 60323115003 | |
|--|------------|-------------------------|--|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|-----------------------------------|------------------------------------|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|------------------------|
| Analytical Method | Analyte | | | Unit | | | Duplicate Pair | | Duplicate Pair | | | | | |
| Appendix IV - Assessment Monitoring | | | | | | | | | | | | | | |
| 6010 | Antimony | 0.006 | mg/l | 0.000086 J | 0.000085 J | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.00011 J | 0.001 U | 0.00009 J | 0.001 U | |
| 6010 | Arsenic | 0.01 | mg/l | 0.01 U | 0.0063 J | 0.01 U | 0.006 J | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | |
| 6010 | Barium | 2 | mg/l | 0.052 | 0.0497 | 0.132 | 0.135 | 0.135 | 0.134 | 0.176 | 0.183 | 0.106 | 0.112 | |
| 6010 | Beryllium | 0.004 | mg/l | 0.001 U | 0.001 U | 0.00029 J | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | |
| 6010 | Cadmium | 0.005 | mg/l | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | |
| 6010 | Chromium | 0.1 | mg/l | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | |
| 6010 | Cobalt | 0.006 | mg/l | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U | |
| 300 | Fluoride | 4 | mg/l | 0.43 | 0.12 J | 0.52 | 0.51 | 0.55 | 0.57 | 0.55 | 0.57 | 0.27 | 0.35 | |
| 6010 | Lead | 0.015 | mg/l | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | |
| 6010 | Lithium | 0.07261 | mg/l | 0.0408 | 0.0416 | 0.0357 | 0.036 | 0.0354 | 0.0351 | 0.0298 | 0.031 | 0.0472 | 0.0489 | |
| 7470 | Mercury | 0.002 | mg/l | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | 0.0002 U | |
| 6010 | Molybdenum | 0.1 | mg/l | 0.02 U | 0.0035 J | 0.0063 J | 0.0049 J | 0.0074 J | 0.0057 J | 0.0061 J | 0.0056 J | 0.02 U | 0.02 U | |
| 6010 | Selenium | 0.05 | mg/l | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | 0.015 U | |
| 6010 | Thallium | 0.002 | mg/l | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | |
| Calculated 903.1/904 | | Radium 226/228 Combined | 5 | pCi/L | 1.14 ± 0.841 J | 0.949 ± 0.746 J | 1.20 ± 0.993 J | 0.858 ± 0.914 J | 1.24 ± 0.963 J | 1.29 ± 0.906 J | 0.681 ± 0.946 J | 1.56 ± 1.00 J | 0.403 ± 0.779 J | 0.000 ± 0.833 J |

Notes:

°C = degree Celsius

BA = Bottom Ash

GWPS = Groundwater Protection Standard

J = Result as an estimated value

J+ = Result qualified as estimated; biased high

JU = Result qualified as nondetect during data validation

mg/l = milligram per liter

pCi/L = picocuries per liter

Attachment 4 (continued)
Summary Groundwater Analytical Results: August 2019 and December 2019
Inactive Ash Pond (More's Lake)
Columbia Municipal Power Plant - Columbia, MO

| | | GWPS | Sample Location Sample Date Lab ID | MW-5 8/27/2019 60313169004 | MW-5 12/04/2019 60323115004 | MW-6 8/27/2019 60313169005 | MW-6 12/04/2019 60323115005 | MW-7 8/27/2019 60313169006 | MW-7 12/04/2019 60323115006 | MW-8 8/27/2019 60313169001 | MW-8 12/04/2019 60323115001 | PZ-2 8/26/2019 60313018001 | PZ-2 12/03/2019 60322982001 |
|--|-------------------------|---------|--|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|----------------------------------|-----------------------------------|
| Analytical Method | Analyte | Unit | | | | | | | | | | | |
| Appendix IV - Assessment Monitoring | | | | | | | | | | | | | |
| 6010 | Antimony | 0.006 | mg/l | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.00032 J | 0.00013 J | 0.000096 J | 0.001 U | 0.00019 J | 0.00021 J |
| 6010 | Arsenic | 0.01 | mg/l | 0.0052 J | 0.0041 J | 0.01 U | 0.005 J | 0.0093 J | 0.0062 J | 0.01 U | 0.0077 J | 0.01 U | 0.01 U |
| 6010 | Barium | 2 | mg/l | 0.22 | 0.212 | 0.063 | 0.0617 | 0.111 | 0.0865 | 0.0203 | 0.0229 | 0.0669 | 0.07 |
| 6010 | Beryllium | 0.004 | mg/l | 0.00027 J | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.001 U | 0.00032 J | 0.001 U | 0.001 U | 0.001 U |
| 6010 | Cadmium | 0.005 | mg/l | 0.005 U | 0.005 U |
| 6010 | Chromium | 0.1 | mg/l | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.0059 | 0.0019 J | 0.0013 J | 0.0013 J | 0.005 U | 0.005 U |
| 6010 | Cobalt | 0.006 | mg/l | 0.005 U | 0.005 U | 0.001 J | 0.005 U | 0.003 J | 0.005 U | 0.005 U | 0.005 U | 0.005 U | 0.005 U |
| 300 | Fluoride | 4 | mg/l | 0.45 | 0.54 | 0.29 | 0.34 | 0.42 | 0.46 | 0.17 J | 0.21 J | 0.53 | 0.55 |
| 6010 | Lead | 0.015 | mg/l | 0.01 U | 0.01 U | 0.0048 J | 0.0038 J | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U | 0.01 U |
| 6010 | Lithium | 0.07261 | mg/l | 0.0376 | 0.0369 | 0.0477 | 0.0512 | 0.037 | 0.0404 | 0.0245 | 0.0238 | 0.0148 | 0.0086 J |
| 7470 | Mercury | 0.002 | mg/l | 0.0002 U | 0.0002 U |
| 6010 | Molybdenum | 0.1 | mg/l | 0.0034 J | 0.0037 J | 0.02 U | 0.02 U | 0.0051 J | 0.0052 J | 0.02 U | 0.02 U | 0.02 U | 0.0033 J |
| 6010 | Selenium | 0.05 | mg/l | 0.015 U | 0.015 U |
| 6010 | Thallium | 0.002 | mg/l | 0.001 U | 0.001 U |
| Calculated 903.1/904 | Radium 226/228 Combined | 5 | pCi/L | 1.52 ± 1.04 J | 0.124 ± 1.05 J | 1.20 ± 1.01 J | 0.849 ± 0.956 J | 0.527 ± 0.843 J | 0.448 ± 0.660 J | 1.44 ± 0.908 J | 0.262 ± 0.912 J | 0.486 ± 0.955 J | 2.80 ± 1.08 J |

Notes:

^aC = degree Celsius

BA = Bottom Ash

GWPS = Groundwater Protection Standard

J = Result as an estimated value

J+ = Result qualified as estimated; biased high

JU = Result qualified as nondetect during data validation

mg/l = milligram per liter

pCi/L = picocuries per liter

ATTACHMENT 5 – CERTIFICATION OF CLOSURE BY REMOVAL

**City of Columbia, Missouri
Water & Light Department
More's Lake Inactive Surface Impoundment**

CLOSURE BY REMOVAL OF COAL COMBUSTION RESIDUALS CERTIFICATION

The final rule for the regulation and management of Coal Combustion Residuals (CCR) was published by the United States Environmental Protection Agency (USEPA) in 40 CFR §257 and §261 (herein referred to as the Final Rule) on April 17, 2015. The Final Rule applies to the inactive CCR surface impoundment known as More's Lake at City of Columbia Water & Light Department's (City) Columbia Municipal Power Plant (CMPP).

I hereby certify, as a Professional Engineer in the State of Missouri that to the best of my knowledge the removal of CCR was completed at the existing inactive CCR surface impoundment known as More's Lake, in general accordance with 40 CFR §257.102(c) and the Closure by Removal Verification Plan issued by Burns & McDonnell on August 31, 2018. The removal and final inspection were complete as of May 31st, 2019 and groundwater monitoring conducted in August and December 2019 confirmed that concentrations of constituents listed in 40 CFR 257, Appendix IV did not exceed their respective groundwater protection standards established pursuant to 40 CFR §257.95(h).

Brian C. Weis, Missouri PE-2011000962